UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 15 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7663 6155
RETURN RECEIPT REQUESTED

Mr. Bill Meike
General Manager
Mold-Tech
279 East Lies Road
Carol Stream, Illinois 60188

Re: Notice of Violation
Compliance Evaluation Inspection
ILR 000 069 252

Dear Mr. Meike:

On September 23, 2014 a representative of the U.S. Environmental Protection Agency inspected the Mold-Tech facility located in Carol Stream, Illinois. As a "large quantity generator" of hazardous waste, Mold-Tech is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Mold-Tech's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Mold-Tech, EPA's review of records pertaining to Mold-Tech, and the inspector's observations, EPA has determined that Mold-Tech has unlawfully stored hazardous waste without a permit or interim status as a result of Mold-Tech's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Mold-Tech was out of compliance at the time of the inspection in paragraphs 1 through 6, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 3 through 6 are also independent TSD

requirements incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of Mold-Tech to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ill. Admin. Code tit. 35 Part 724 [40 C.F.R. Part 264] (if the facility should have been permitted).

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM AND VIOLATIONS OF TSD REQUIREMENTS]

1. Date When Each Period of Accumulation Begins

Under Ill. Admin. Code tit. 35 § 722.134(a)(2) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, Mold-Tech maintained three tanks of corrosive hazardous waste that were not marked with the date upon which each period of accumulation of hazardous waste began.

2. Hazardous Waste Container Labeling

Under Ill. Admin. Code tit. 35 § 722.134(a)(3) [40 C.F.R. § 262.34(a)(3)], a large quantity generator must label or clearly mark each container holding hazardous waste with the words "Hazardous Waste."

At the time of the inspection, the surge tank used to hold corrosive hazardous waste was not labeled with the words "hazardous waste."

The permit exemption conditions identified below in paragraphs 3 through 6 are also independent TSD requirements violated by Mold-Tech:

3. Written Hazardous Waste Tank Assessment

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(B) and 725.292(a) [40 C.F.R. §§ 262.34(a)(1)(ii) and 265.192(a)], a large quantity generator that owns or operates a new hazardous waste tank system must obtain a written assessment, reviewed and certified by an independent registered professional engineer, attesting that the system has sufficient structural integrity and is acceptable for storing hazardous waste.

At the time of the inspection, Mold-Tech did not have a written hazardous waste tank assessment for its hazardous waste tanks; 1) the 30x30x30 hazardous waste surge tank; and, 2) the 550 gallon hazardous waste storage tank. Both tanks were storing corrosive hazardous waste.

4. Inspections

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(B) and 725.295(a), (b) and (g) [40 C.F.R. §§ 262.34(a)(1)(ii) and 265.195(a), (b) and (g)], a large quantity generator that owns or operates a new hazardous waste tank system must inspect, at least each operating day, the following: 1) overfill/spill control equipment; 2) the aboveground portion of the tank system for corrosion or releases; 3) data from monitoring equipment; and, 4) the construction materials and the area immediately surrounding the external portion of the system. These inspection(s) must be documented in the operating record of the facility.

At the time of the inspection, Mold-Tech was not documenting inspections, at least each operating day, of the following: 1) overfill/spill control equipment; 2) the aboveground portion of the tank system for corrosion or releases; 3) data from monitoring equipment; and, 4) the construction materials and the area immediately surrounding the external portion of the system.

5. Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(a) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(b) and (c) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain a written job description for each position at the facility related to hazardous waste management;

At the time of the inspection, Mold-Tech did not have and was unable to provide in response to a request a written description for each position related to hazardous waste management at the facility.

6. Contingency Plan

A large quantity generator of hazardous waste must have a contingency plan for its facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any un-planned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.155(a) [40 C.F.R. §§ 262.34(a)(4) and 265.51(a)]. The contingency plan must describe the actions facility personnel must take

to comply in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan must include a list of all emergency equipment at the facility, where the equipment is required. The plan must include the location and a physical description of each item on the list and a brief outline of its capabilities. The plan must include an evacuation plan for facility personnel. Copies of the contingency plan should be submitted to local police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4), 725.152(a), (e), (f) and 725.153(b) [40 C.F.R. §§ 262.34(a)(4), 265.52(a), (e), (f) and 265.53(b)].

At the time of the inspection, Mold-Tech's contingency plan did not describe the action required to respond to fires, explosions or releases. It also did not identify all emergency equipment, including the description, capability or location of the equipment. The plan did not include an evacuation plan, signal or alternate evacuation route. The plan had not been submitted to the police department, fire department, hospital or emergency response team.

Summary: By failing to comply with the conditions for a permit exemption, above, Mold-Tech became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. Mold-Tech failed to apply for such a permit. Mold-Tech's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

It should also be noted that at the time of EPA's inspection, Mold-Tech was not properly storing universal waste lamps, as described below.

Universal Waste Requirement

1. Under Ill. Admin. Code tit. 35 § 733.113(d)(1), [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonable foreseeable conditions.

   At the time of the inspection, Mold-Tech was storing universal waste lamps in a container that was not closed.

2. Under Ill. Admin. Code tit. 35 § 733.115(a) and (c), [40 C.F.R. § 273.15(a) and (c)], a small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated or received from

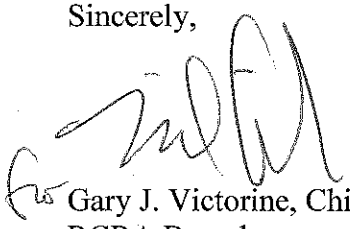
another handler. A small quantity handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it became a waste or was received.

At the time of the inspection, Mold-Tech was storing universal waste lamps in a container without an accumulation start date or a method to demonstrate the length of time that the universal waste had been accumulated from the date it became a waste or was received.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than thirty (30) days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Ms. Jamie Paulin, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Paulin, of my staff, at 312-886-1771, or at Paulin.jamie@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Mold-Tech

EPA ID No.: ILR 000 069 252

LOCATION ADDRESS: 279 East Lies Road
Carol Stream, Illinois 60188

NAICS CODE(S): 332812 [Metal coating, engraving (except jewelry and silverware), and allied services to manufacturers]

DATE OF INSPECTION: September 23, 2014

EPA INSPECTOR:
Jamie L. Paulin
Chemist
LR-8J
Compliance Section 1
(312) 886-1771 Direct
(312) 353-4788 Facsimile
paulin.jamie@epa.gov

PREPARED BY:
Jamie L. Paulin
Chemist
3/30/15
Date

APPROVED BY:
Michael Cunningham, Section Chief
Compliance Section 1
RCRA Branch
4/2/15
Date

INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at the Mold-Tech facility, located at 279 East Lies Road, Carol Stream, Illinois, to examine Mold-Tech's management of its Resource Conservation and Recovery Act (RCRA) regulated waste, and to determine Mold-Tech's compliance with RCRA, including used oil regulations.

Mold-Tech notified as a large quantity generator (LQG) on or about December 8, 1999, and has remained in LQG status. Mold-Tech performs such operations as mold texturing, mold laser engraving, paint texturing and mold and roll coating.

Mold-Tech employs about 26 people and operates 5-6 days per week with one shift. They generate corrosive hazardous waste having the waste number of D002. The hazardous waste is stored in tanks. They previously operated a waste water treatment unit; however they no longer operate one on-site.

OPENING CONFERENCE:

I entered the Mold-Tech facility at 10:49 am on September 23, 2014. I introduced myself, presented my credentials, and described the purpose of my visit. I met with Mr. Bill Meike, General Manager, and Mr. Matt Crost, Plant Manager.

I provided a Small Business Resources Information Sheet to them. Neither of them made a CBI claim on the information gathered during the inspection or on the photos taken, documents copied and/or verbal information provided.

Mr. Meike described the process and operations of Mold-Tech during the opening conference. According to Mr. Meike, Mold-Tech offers a wide variety of services, including mold texturing, mold laser engraving, and pattern design.

They use a spray booth, a sand blaster, and a spray wash operation within their facility. A nitric acid is used in the etching process. The only waste generated at the facility is a corrosive hazardous waste having waste number D002.

After our discussion, we began the physical site inspection immediately following the opening conference.

SITE INSPECTION:

Mr. Meike and Mr. Crost escorted me on the physical inspection, which began in the operations area. They showed me the various operations and the various baths that were used. From there,

we went to the rinse area. Mr. Crost explained that, in this area, the etched parts were rinsed and then: 1) the rinse water is washed into a tray, located below, and around the perimeter of, the platform rinsing area; 2) then pumped into a surge tank (30ft by 30ft by 30ft); 3) then pumped into a small 550 gallon tank; and, 4) then pumped into a hazardous waste storage tank, with a volume of about 1700 gallons. *See*, photographs 1 and 2.

In the open rinse area, Mr. Crost also showed me the spray booth and the sandblasting area. *See*, photograph 3.

We then proceeded to the hazardous waste storage tanks. Mr. Gregory Uzumecki, Production Manager, joined us at this point in the inspection to describe the hazardous waste storage. According to Mr. Uzumecki, the hazardous waste is pumped from the trays, located under and around the perimeter of the rinse platform, to a surge tank, then to a small hazardous waste storage tank and then to a large hazardous waste storage tank. The large and small tanks were labeled with the words, "Hazardous Waste," however neither had an accumulation start date located on the tanks. The surge tank was not labeled with the words, "Hazardous Waste," or with an accumulation start date. There appeared to be some hazardous waste located in the tray near the small hazardous waste storage tank. To summarize, the hazardous waste is pumped from the trays to a surge tank, then to the small hazardous waste storage tank until a certain level is reached, and then automatically is pumped to the larger hazardous waste storage tank. *See*, photographs 4 - 7.

From the hazardous waste storage area, we proceeded to a process area where several product 55-gallon containers were being stored. Liquid was located on the floor in this area. Mr. Crost explained that no drains were located on the floor and that the employees sweep this liquid into the trays that get pumped to the hazardous waste storage tanks continually as needed during the shifts. *See*, photograph 8.

Mr. Crost then showed me the universal waste lamp storage area. The used fluorescent light bulbs were being stored in a labeled container; however the container was open and there was no accumulation start date associated with the container. *See*, photographs 8 through 10.

This area was the last to be inspected. We returned to a conference room to complete the records review.

RECORDS REVIEW:

Mr. Crost and Mr. Kevin Wickey, Information Systems, aided me in the review of the hazardous waste records after completing the physical site inspection.

1. Personnel Training

Mold-Tech did have a RCRA training program in place. Environmental Resource Center

provided training for the years 2011, 2012 and 2013. However, they did not have written job descriptions for each position related to hazardous waste management.

2. Manifests

I reviewed the manifests of the hazardous waste shipments for the years 2012, 2013 and 2014. The manifest records that I reviewed were being properly managed. There were no issues with the manifests I reviewed for shipments for off-site disposal.

3. Waste Analysis and Recordkeeping

I observed that Mold-Tech did have, as a record on-site, a land disposal restriction (LDR) notification form for shipments of hazardous waste.

4. Contingency Plan

A Contingency Plan was available for my review during the inspection. However, the plan did not describe the action required for a response to fires, explosions or releases. It also did not identify all emergency equipment, including the description, capability or location of the equipment. The plan did not include an evacuation plan, signal or alternate evacuation route. The plan had not been submitted to the police department, fire department, hospital or emergency response team.

5. Preparedness and Prevention

Agreements with local emergency authorities, contractors, or local hospitals were available for my review during the inspection.

6. Annual Reporting

Mold-Tech had filed an annual report with IEPA by March 1 for the reporting years of 2011, 2012 and 2013. They are currently listed as an LQG within the EPA's RCRAInfo database.

7. Weekly and Daily Inspections

Mold-Tech was not documenting daily inspections of the hazardous waste storage tanks.

8. Tank Systems

Mold-Tech did have a tank assessment of the 1700 gallon hazardous waste storage tank. Environmental Site Assessment and Remediation Management Services performed the certification in 2010. However, the assessment did not include the 30x30x30 hazardous waste surge tank or the 550 gallon hazardous waste storage tank.

According to the report:

- The large hazardous waste storage tank did have secondary containment.
- The secondary containment was equipped with a liquid sensor that can indicate the presence of material within the secondary containment.
- The secondary containment is constructed of reinforced concrete with a corrosive resistant sealant applied.
- The secondary containment is sloped to a collection sump located adjacent to the large hazardous waste storage tank.

CLOSING CONFERENCE:

I conducted the closing conference with Mr. Crost and Mr. Wickey. I explained to them that I would need to review my notes and photographs before making any compliance decisions. I also explained that I would submit a copy of my inspection report along with the photo log to Mold-Tech.

I made the following recommendations to Mr. Crost and to Mr. Wickey:

- Label the hazardous waste storage tanks with a date of accumulation.
- Keep a written log of the daily inspections of the hazardous waste storage tanks and the ancillary equipment.
- Keep the container of universal waste lamps closed and determine a way to ensure that storage does not exceed one year.
- Include job descriptions for each position related to hazardous waste management within their records.
- Have tank assessments of smaller hazardous waste storage tanks completed.

I departed Mold-Tech around 1:00pm.

ATTACHMENT: (2)

Attachment 1 Photographs taken during the time of the inspection.
Attachment 2 Inspection Check list

ENCLOSURE: (1)

Photographs for Mold-Tech CEI 9/23/2014

Media: RCRA

Disk Number 1
Photo Number 1
Photo Filename DSCN0761.JPG
Date/Time 9/23/2014 11:18:00 AM
Photographer Jamie Paulin

Description

Process bath. Parts are rinsed in this area. Rinse water rolls into a tray and is pumped to hazardous waste tanks. Nitric Acid is used in the etching process.

Disk Number 1
Photo Number 2
Photo Filename DSCN0762.JPG
Date/Time 9/23/2014 11:18:00 AM
Photographer Jamie Paulin

Description

Process Area. Parts are rinsed on platform and water runs into tray. From there it is pumped into hazardous waste storage tank.

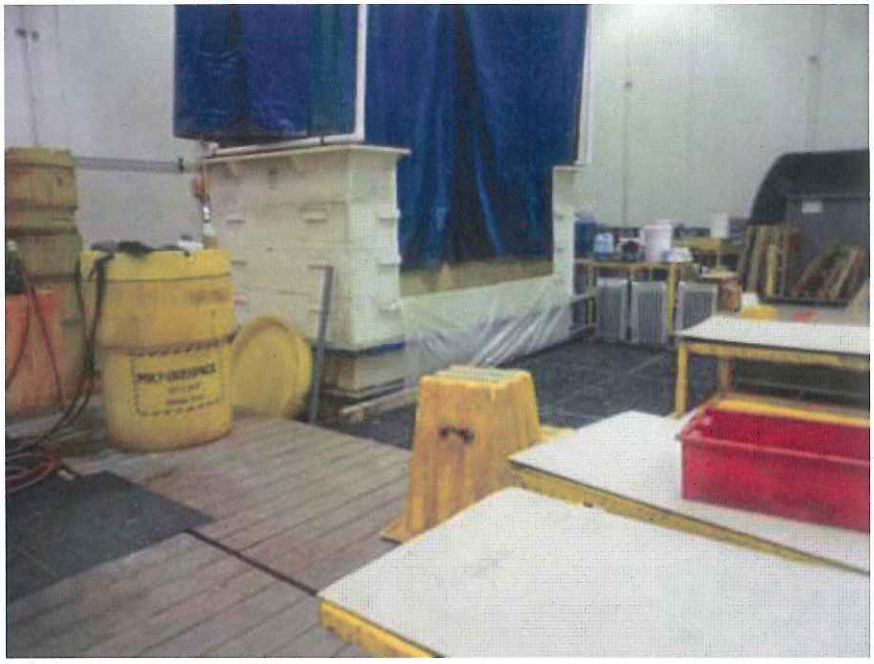
Photographs for Mold-Tech CEI 9/23/2014

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN0763.JPG
Date/Time 9/23/2014 11:18:00 AM
Photographer Jamie Paulin

Description

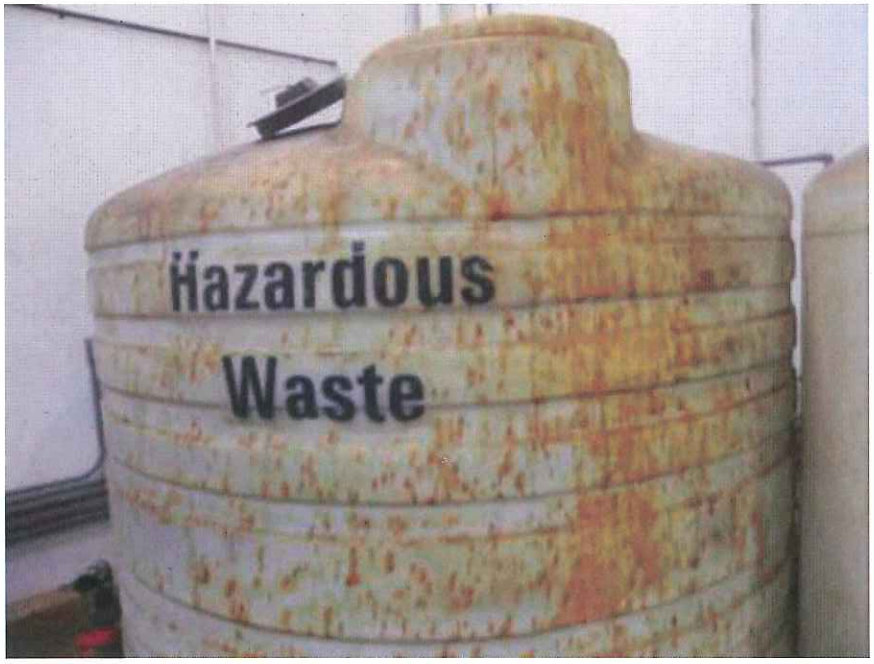
Spray booth. Water based paint is used in the process.



Disk Number 1
Photo Number 4
Photo Filename DSCN0764.JPG
Date/Time 9/23/2014 11:32:00 AM
Photographer Jamie Paulin

Description

Hazardous waste storage tank. No hazardous waste accumulation start date was located on tank.



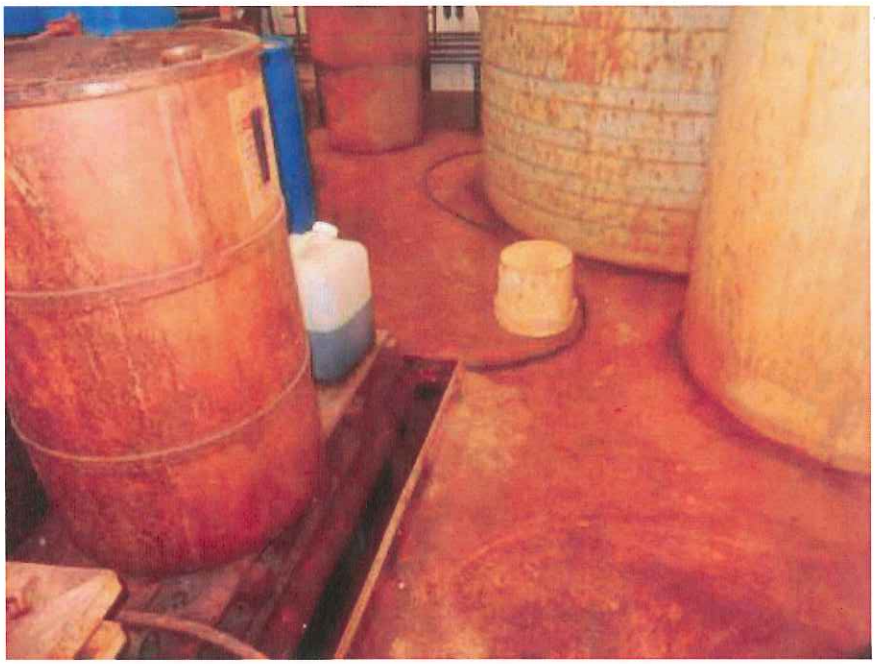
Photographs for Mold-Tech CEI 9/23/2014

Media: RCRA

Disk Number 1
Photo Number 5
Photo Filename DSCN0765.JPG
Date/Time 9/23/2014 11:32:00 AM
Photographer Jamie Paulin

Description

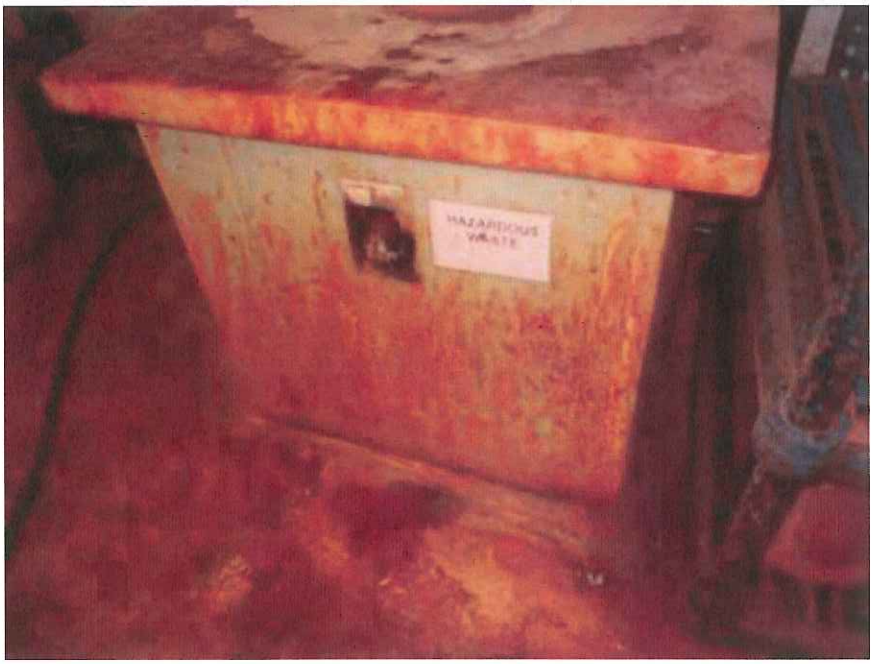
Hazardous waste is pumped from the tray into a surge tank and then into a small hazardous waste storage tank. Hazardous waste was located in the tray near the small hazardous waste storage tank at the time of the inspection.



Disk Number 1
Photo Number 6
Photo Filename DSCN0766.JPG
Date/Time 9/23/2014 11:32:00 AM
Photographer Jamie Paulin

Description

Small hazardous waste storage tank. Hazardous waste is pumped from tray to a surge tank and then to this tank, before being pumped into a larger hazardous waste tank. No accumulation start date was located on tank.



Photographs for Mold-Tech CEI 9/23/2014

Media: RCRA

Disk Number 1
Photo Number 7
Photo Filename DSCN0767.JPG
Date/Time 9/23/2014 11:33:00 AM
Photographer Jamie Paulin

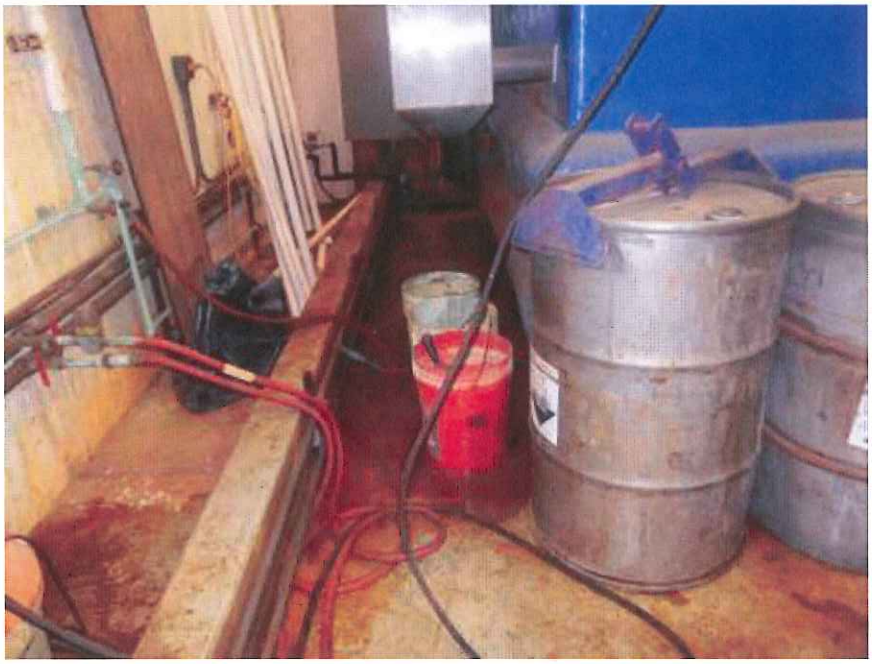
Description

Tray located under process platform. Hazardous waste is pumped through pumps to the hazardous waste storage tanks. No liquid was located in tray near process area.

Disk Number 1
Photo Number 8
Photo Filename DSCN0768.JPG
Date/Time 9/23/2014 11:33:00 AM
Photographer Jamie Paulin

Description

Liquid was located on the floor near the process area and near product containers. Mold-Tech stated that they sweep waste into trays that is pumped into hazardous waste storage tank.



Photographs for Mold-Tech CEI 9/23/2014

Media: RCRA

Disk Number	1
Photo Number	9
Photo Filename	DSCN0769.JPG
Date/Time	9/23/2014 11:40:00 AM
Photographer	Jamie Paulin

Description

Universal waste storage. Used fluorescent light bulbs. The container was opened and did not contain an accumulation start date.

Mold-Tech 9/23/14 ILR 000 069 252

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	**Section 722.111 Hazardous Waste Determination** Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes ✓ No ____ N/A ____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes ____ No ____ N/A ____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes ____ No ____ N/A ____	808.121(a)
	Section 722.112 USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes ____ No ____ N/A ____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes ____ No ____ N/A ____	722.112(c)
	SUBPART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes ✓ No ____ N/A ____	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes ✓ No ____ N/A ____	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes ✓ No ____ N/A ____	722.120(b)
	Section 722.121 Acquisition of Manifests Has the generator used:	722.120(d)
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes ✓ No ____ N/A ____	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes ✓ No ____ N/A ____	
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes ✓ No ____ N/A ____	722.121(b)
	Section 722.122 Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes ✓ No ____ N/A ____	722.122
	Section 722.123 Use of the Manifest	
722.123(a)	For each manifest reviewed, has the generator: - signed the certificate by hand? Yes ✓ No ____ N/A ____	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ____ N/A ____	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes ✓ No ____ N/A ____	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes ✓ No ____ N/A ____	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes ✓ No ____ N/A ____	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes ✓ No ____ N/A ____	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
	Is there any hazardous waste ready for transport off-site? Yes ✓ No_____ N/A_____	
722.130	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes ✓ No_____ N/A_____	722.130
	Section 722.134 Accumulation Time	
(722.134(a))	Has the generator complied with the following requirements: Yes_____ No_____ N/A_____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes ✓ No_____ N/A_____	
	and/or	
	B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes_____ No ✓ N/A_____	
	and/or	
	C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes_____ No_____ N/A ✓	
	and/or	
	D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes_____ No_____ N/A ✓	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes_____ No ✓ N/A_____	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes_____ No ✓ N/A_____	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes_____ No ✓ N/A_____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes_____ No ✓ N/A_____	
	If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
	Has the generator closed an accumulation area?	725.211
(725.211)	Yes_____ No_____ N/A_____	
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes_____ No_____ N/A_____	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes_____ No_____ N/A_____	
(725.272)	Is the waste compatible with the container and/or liner? Yes_____ No_____ N/A_____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes_____ No_____ N/A_____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes_____ No_____ N/A_____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes_____ No_____ N/A_____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes_____ No_____ N/A_____ **Note:** See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes_____ No_____ N/A_____ COMMENTS:	
(725.278)	**Section 725.278 Air Emission Standards** Is the owner or operator managiing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A✓ Comments:	
	Does the generator accumulate and/or treat hazardous waste in tanks? Yes✓ No_____ N/A_____ **Note:** If "No", go to Subpart C.	
	SUBPART J: TANK SYSTEMS	
	Has the generator closed an accumulation area? Yes_____ No✓ N/A_____	725.211
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes_____ No_____ N/A✓	725.214
(725.290)	Does the facility accumulate or treat hazardous waste in tanks? Yes✓ No_____ N/A_____ **Note:** A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J. a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks **existing** prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes_____ No_____ N/A_____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the wastes? Yes_____ No_____ N/A_____ 3) existing corrosion protection measures? Yes_____ No_____ N/A_____ 4) documented age of the tank system? Yes_____ No_____ N/A_____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes_____ No_____ N/A_____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes_____ No_____ N/A_____ **Note:** If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For **new** tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes_____ No_____ N/A_____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the waste(s) to be handled? Yes_____ No_____ N/A_____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes_____ No_____ N/A_____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes_____ No_____ N/A_____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes_____ No_____ N/A_____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	Is secondary containment provided for any new tank system before being put into service? Yes ✓ No N/A Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes No N/A ✓ For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes No N/A ✓ For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes No N/A ✓ or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes No N/A ✓ For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes No N/A ✓	
(725.293(b))	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes ✓ No N/A Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes ✓ No N/A	
(725.293(c))	To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes ✓ No N/A 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes ✓ No N/A 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes ✓ No N/A 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes ✓ No N/A and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes ✓ No N/A **Note:** A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	
(725.293(d))	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes ✓ No N/A	
(725.293(e))	Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes ✓ No N/A	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes ✓ No____ N/A____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes____ No____ N/A ✓ 2) Are welded flanges, joints and connections inspected daily? Yes____ No____ N/A ✓ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes____ No____ N/A ✓ 4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes____ No____ N/A ✓	
(725.293(i))	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes____ No____ N/A ✓ 2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes____ No____ N/A ✓ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes____ No ✓ N/A____ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	
(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes____ No ✓ N/A____	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes ✓ No____ N/A____ 2) overfill prevention controls? Yes ✓ No____ N/A____ 3) sufficient freeboard in uncovered tanks? Yes ✓ No____ N/A____	
(725.294(c))	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes____ No ✓ N/A____ 2) the aboveground portion of the tank system for corrosion or releases? Yes____ No ✓ N/A____ 3) data from monitoring equipment? Yes____ No ✓ N/A____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes____ No ✓ N/A____	No written documentation
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes____ No____ N/A ✓	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes____ No ✓ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes_____ No_____ N/A✓ b) removed applicable waste from the system within 24 hours of detection? Yes_____ No_____ N/A✓ c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes_____ No_____ N/A✓	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes_____ No_____ N/A✓ d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes_____ No_____ N/A✓ **Note:** Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	
(725.296(e))	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes_____ No_____ N/A✓ e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes_____ No_____ N/A✓ e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes_____ No_____ N/A✓ e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes_____ No_____ N/A✓	
(725.296(f))	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes_____ No_____ N/A✓ **Note:** If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	
(725.297(a))	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes_____ No_____ N/A✓	
(725.297(a))	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes_____ No_____ N/A✓	
(725.297(b))	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes_____ No_____ N/A✓ **Note:** Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	Are ignitable or reactive wastes placed in a tank system? Yes_____ No_____ N/A_____ If "No", skip to Section 725.299. Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes_____ No_____ N/A_____ - Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ or Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes_____ No_____ N/A_____ or Is the tank used solely for emergencies? Yes_____ No_____ N/A_____	
(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes_____ No_____ N/A_____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes_____ No_____ N/A_____ If "No", skip to Section 725.300. Is Section 725.117(b) being complied with? Yes_____ No_____ N/A_____ Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ COMMENTS:	
	Section 725.302 Air Emission Standards	
(725.302)	Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A_____ Comments:	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PREPAREDNESS AND PREVENTION	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes ✓ No____ N/A____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes ✓ No____ N/A____ b) a telephone or other device to summon emergency assistance from local authorities? Yes ✓ No____ N/A____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____ d) water at adequate volume and pressure for fire control? Yes ✓ No____ N/A____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes ✓ No____ N/A____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes____ No ✓ N/A____	
(725.135)	Is the facility maintaining adequate aisle space? Yes ✓ No____ N/A____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes ✓ No____ N/A____ - agreements designating the primary authority where more than one police or fire department might respond? Yes ✓ No____ N/A____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes ✓ No____ N/A____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No____ N/A____	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes ✓ No____ N/A____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes____ No____ N/A ✓	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes____ No____ N/A ✓ If "Yes", has the contingency plan been carried out immediately? Yes____ No____ N/A ✓	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes____ No ✓ N/A____ - explosions? Yes____ No ✓ N/A____ - releases? Yes____ No ✓ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	Does the plan describe arrangements with: - police and fire departments? Yes ✓ No____ N/A____ - hospitals? Yes ✓ No____ N/A____ - contractors? Yes ✓ No____ N/A____ - emergency response teams? Yes ✓ No____ N/A____	
(725.152(d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes ✓ No____ N/A____	
(725.152(e))	Does the plan identify all emergency equipment including: - description? Yes____ No ✓ N/A____ - capability? Yes____ No ✓ N/A____ - location? Yes____ No ✓ N/A____ Is the list of emergency equipment up-to-date? Yes____ No ✓ N/A____	
(725.152(f))	Does the plan include: - an evacuation plan? Yes____ No ✓ N/A____ - an evacuation signal? Yes____ No ✓ N/A____ - alternate evacuation routes? Yes____ No ✓ N/A____	
(725.153)	Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes ✓ No____ N/A____ b) submitted to: - police department? Yes____ No ✓ N/A____ - fire department? Yes____ No ✓ N/A____ - hospital? Yes____ No ✓ N/A____ - emergency response teams? Yes____ No ✓ N/A____	
(725.154)	Has the contingency plan been reviewed and revised whenever: a) regulations are revised? Yes____ No____ N/A ✓ b) the plan fails in an emergency? Yes____ No____ N/A ✓ c) the facility changes in a way that modifies the emergency response necessary? Yes____ No____ N/A ✓ d) information regarding emergency coordinators changes? Yes____ No____ N/A ✓ e) information regarding equipment changes? Yes____ No____ N/A ✓	
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes ✓ No____ N/A____ Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes ✓ No____ N/A____ Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes ✓ No____ N/A____	
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes____ No____ N/A ✓ **Note:** If the facility has had a release, explain in detail.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	**Section 725.116 Personnel Training** Does the facility have a training program? Yes ✓ No____ N/A____ Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes ✓ No____ N/A____ Is the program directed by a person trained in hazardous waste management procedures? Yes ✓ No____ N/A____ Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes ✓ No____ N/A____ Does the program cover, at a minimum: - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes ✓ No____ N/A____ - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No____ N/A____ - key parameters for automatic waste feed cut-off systems? Yes ✓ No____ N/A____ - communications or alarm systems? Yes ✓ No____ N/A____ - response to fire or explosions? Yes ✓ No____ N/A____ - response to groundwater contamination incidents? Yes ✓ No____ N/A____ - shutdown of operations? Yes ✓ No____ N/A____	
(725.116(b))	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No____ N/A____	
(725.116(c))	Have facility personnel received an annual review of the initial training? Yes ✓ No____ N/A____	
(725.116(d))	Are the following documents and records being maintained at the facility: 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes ✓ No____ N/A____ 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes____ No ✓ N/A____ 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes ✓ No____ N/A____ 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes ✓ No____ N/A____	A1
(725.116(e))	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes ✓ No____ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	**Section 728.107 Waste Analysis and Recordkeeping** Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes_____ No_____ N/A ✓ Is the plan on-site? Yes_____ No_____ N/A ✓ Does the plan include a detailed physical and chemical analysis? Yes_____ No_____ N/A ✓ Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes_____ No_____ N/A ✓ Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes ✓ No_____ N/A_____	
722.134(c)	**Section 722.134 Satellite Accumulation** Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes_____ No_____ N/A ✓ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes_____ No_____ N/A ✓ If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes_____ No_____ N/A ✓ During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes_____ No_____ N/A ✓	
722.134(g)	**Note:** A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	**Section 722.140 Recordkeeping** Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes ✓ No_____ N/A_____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes ✓ No_____ N/A_____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No_____ N/A_____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes_____ No_____ N/A ✓	722.140(d)
722.141(a)	**Section 722.141 Annual Reporting** Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No_____ N/A_____ **Note:** If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No_____ N/A_____	722.141(b)
	Section 722.142 Exception Reporting	
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes_____ No_____ N/A ✓	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes_____ No_____ N/A ✓	722.142(a)(2)
722.143	**Section 722.143 Additional Reporting** Has the generator furnished additional reports as required by the Director? Yes_____ No_____ N/A ✓	722.143
	SUBPART E: EXPORTS OF HAZARDOUS WASTE	
722.150	Is the generator an exporter of hazardous waste? Yes_____ No ✓ N/A_____ If "Yes", has the generator complied with the requirements of Subpart E? Yes_____ No_____ N/A ✓	722.150
	SUBPART F: IMPORTS OF HAZARDOUS WASTE	
722.160	Is the generator an importer of hazardous waste? Yes_____ No ✓ N/A_____ If "Yes", has the generator complied with the requirements of Subpart F? Yes_____ No_____ N/A ✓	722.160
	SUBPART G: FARMERS	
722.170	Is the generator a farmer? Yes_____ No ✓ N/A_____ If "Yes", has the generator complied with the requirements of Subpart G? Yes_____ No_____ N/A ✓	722.170
	COMMENTS:	

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US EPA Region 5 Document Log

EPA Inspector:
Jamie L. Paulin

Production Area	Description	Area Requested From	Date Received	EPA Document Number	CBI Claimed	Pages Obtained
General	Mold-Tech Contingency Plan	Records	9/23/2014	JP-mt-01-14	No	29
General	RCRA Certification Hazardous Waste Tank Storage and Secondary Containment System Assessment	Illinois Environmental Protection Agency	11/17/2014	JP-mt-02-14	No	18

Production Area	Description	Area Requested From	Date Received	EPA Document Number	CBI Claimed	Pages Obtained